1 2 3 4 5 6	Daniel L. Low, CA Bar No. 218387 dlow@kotchen.com Daniel Kotchen (pro hac vice) dkotchen@kotchen.com KOTCHEN & LOW LLP 1745 Kalorama Road NW, Suite 101 Telephone: 202.841.7164 Facsimile: 202.280.1128 Attorney for Plaintiff CHERYL FILLEKES		
7 8	UNITED STATES DISTRICT COURT		
9	THE NORTHERN DISTRICT OF CALIFORNIA		
10			
11	ROBERT HEATH, and	Case No. 15-cv-01824-BLF	
12	CHERYL FILLEKES, Plaintiffs, on behalf of themselves and	DECLARATION OF DANIEL LOW	
13	others similarly situated,	IN SUPPORT OF PLAINTIFF CHERYL FILLEKES'	
14	Plaintiffs,	ADMINISTRATIVE MOTION TO FILE UNDER SEAL	
15	V.		
16	GOOGLE INC., a Delaware corporation,	Complaint Filed: April 22, 2015	
17	Defendant.	Complaint Filed: April 22, 2015 Trial Date: May 1, 2017	
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28	DECLADATION OF DANIEL LOW IN CURPORT	Case No. 15-cv-01824-BLF	
	DECLARATION OF DANIEL LOW IN SUPPORT OF PLAINTIFF CHERYL FILLEKES' ADMINISTRATIVE MOTION TO FILE UNDER SEAL		

DECLARATION OF DANIEL LOW IN SUPPORT OF PLAINTIFF CHERYL FILLEKES' ADMINISTRATIVE MOTION TO FILE UNDER SEAL

- I, Daniel L. Low, hereby declare as follows, based on personal knowledge:
- 1. Plaintiff Cheryl Fillekes ("Plaintiff") seeks to file Exhibits 1-5, 8, and 13-19 to Plaintiff's Motion for Conditional Certification under seal because they have been designated as Confidential or Highly Confidential Attorneys' Eyes Only by one of the parties pursuant to the Stipulated Protective Order (Dkts. ##37, 38).
- 2. Defendant Google, Inc. has designated Exhibits 1-3, 8, and 13-14 as Highly Confidential Attorneys' Eyes Only. These exhibits appear to contain non-public information regarding Google's hiring process, as well as internal feedback communications concerning Plaintiff's interviews with Google. Google has not waived the confidentiality of this information.
- 3. Plaintiff has designated Exhibits 4-5, and 15-19 as Confidential. These exhibits consist of declarations from unsuccessful Google applicants who believe that they were not hired by Google because of their age. These individuals expressed concern of retaliation from their current employers and/or potential blacklisting from other tech companies if their names were made public in this lawsuit. The declarations also reveal personal information regarding the declarants, such as their age and professional background and qualifications. Plaintiff

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE

Pursuant to Local Rule 79-5(e), I certify that this declaration and all accompanying material was served on the Designating Parties by email on the same day that it was filed.

By: /s/Daniel L. Low

Daniel L. Low